

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI**

STATE OF MISSOURI,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:21-cr-00272
)	
DAVID BARKLAGE,)	
)	
Defendant.)	

MOTION FOR CONTINUANCE

COMES NOW Defendant by and through Counsel Dee Wampler, Joseph S. Passanise, and Taylon Sumners of the WAMPLER AND PASSANISE LAW OFFICE and moves the Court for a continuance of the Plea Hearing scheduled for July 26, 2021, at 10:00 a.m. in accordance with the Legal Suggestions attached hereto:

LEGAL SUGGESTIONS

1. This cause is scheduled for Plea Hearing on July 26, 2021.
2. Counsel is requesting this case be moved due to scheduling conflicts and multiple trials scheduled.
3. Counsel does not believe AUSA Hal Goldsmith will object to having this matter reset.

WHEREFORE, Counsel prays for an order herein that the Plea Hearing be reset and for such other and further relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED,

/s/Joseph S. Passanise

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Certificate of Service

I hereby certify that on July 21, 2021, I electronically filed the foregoing with the U.S. District Court Clerk for the Eastern District of Missouri using the CM/ECF system which sent notification of such filing to U.S. Attorney, St. Louis, Missouri.

/s/Joseph Passanise

Dee Wampler

Joseph S. Passanise

Taylon Sumners

Attorneys at Law